


**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jason Goodman, Plaintiff, Proposed Pro Se Counter- Defendant	PRO SE
-against-	21-cv-10878-AT-JLC
D. G. Sweigert, Defendant Proposed Pro Se Counter-Plaintiff	District Judge Analisa Torres
	Magistrate Judge James L. Cott

**NOTICE OF DEFENDANT'S SWORN STATEMENT TO
PRECLUDE PERSONAL JURISDICTION
RESPONSE TO PLAINTIFF'S DOCUMENT 168**

The *pro se* Defendant (Proposed Counter Plaintiff) (undersigned) files these papers to allow the Court to take notice of a sworn statement. Undersigned disputes that personal jurisdiction can be conferred upon him and opposes such finding of personal jurisdiction by this Court.

March 31, 2023 (3/31/23)



**D. G. SWEIGERT PRO SE DEFENDANT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

NOTICE OF DEFENDANT'S SWORN STATEMENT TO
PRECLUDE PERSONAL JURISDICTION
RESPONSE TO PLAINTIFF'S DOCUMENT 168

1. The undersigned, an adult over 18 years of age, makes this statement under the penalties of perjury to aid the Court in deciding issues related to the lack of jurisdiction of this Court on the undersigned.

2. Presently the undersigned is engaged in jurisdictional discovery that demonstrates that the natural person "JASON GOODMAN" is a questionable party to bring this instant lawsuit against the undersigned.

3. As the Court is aware "Jason Goodman" has filed Dkt. 168 MOTION TO QUASH SUBPOENA AND TO ISSUE A PROTECTIVE ORDER on 03/28/2023. The undersigned is attempting to issue a lawful subpoena to the central party to this entire legal action – PATREON, INC.

4. The undersigned is attempting to ascertain if the payments made by PATREON, INC, which Goodman claims have been obstructed, are paid to "JASON GOODMAN" or "21st Century 3D" or "Multimedia System Design, Inc.". It is Jason Goodman that is claiming to have lost monies form his "business" for the purposes of establishing nationwide service via the federal racketeering laws.

5. According to Goodman, the New York State chartered corporation known as Multimedia Systems Design, Inc. (M.S.D.I.) has operated a presumed "DBA" in both New York and California known as "21st CENTURY 3D" (21C3D).

6. 21C3D is a legal nullity and remains an unaccountable organization that solicits funds and credit card payments via the Internet without legal authority to transact commercial exchanges (credit cards) via PATREON.COM.

7. The National Academy of Television Arts and Sciences (NATAS), organizer of the “EMMY” Awards, brought a legal action against M.S.D.I. as a DBA “CrowdSource The Truth” for trademark infringement in the S.D.N.Y. (The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc., 1:20-cv-07269-VEC). (<https://www.hollywoodreporter.com/thr-esq/television-academy-suesafter-emmy-statuetted-given-coronavirus>).

8. The summons document filed in the federal S.D.N.Y. NATAS lawsuit for M.S.D.I. provides the address for service s “Multimedia System Design, Inc., d/b/a CrowdSource The Truth, 208 East 51st Street, Suite 200, New York, N.Y. 10022”. (NATAS v. MSDI, ECF Doc. No. 10, 9/17/2020).

9. The “C.E.O”. of M.S.D.I. is a former “3-D cameraman” named “Jason Goodman” who worked in Hollywood, California, from about 2005 to about 2018, but now claims to be living in the Chelsea section of Manhattan, New York City. While in California, the “C.E.O.” (Goodman) of the corporation (M.S.D.I. / 21C3D), was acting as a corporate agent within his scope of duties. Based upon reason and belief, neither entity (M.S.D.I. / 21C3D) properly registered to conduct such business in California, e.g. failure to register with the California Franchise Tax Board (F.T.B.) or the California Secretary of State (S.O.S.) as a foreign corporation; a violation of California’s Corporations Code § 2105. This constitutes unlawful activity.

10. Transacting unauthorized business is deemed as consenting to the jurisdiction of California courts in any civil action arising in California in which the entity is named as a defendant. It is alleged that the “C.E.O.” (Goodman) made such omissions to maintain an

unaccountable, underground off-book exchange of business funds as an authorized agent of the CrowdSource The Truth’s common enterprise consisting of M.S.D.I. / 21C3D.

11. Suffice that it is a privately held New York State chartered corporation that has listed the C.E.O., known as “Jason Goodman”, and operated other affiliates such as 21C3D. As stated on a public website, 21C3D “maintains” offices in New York and Los Angeles (21C3D 505 8th Avenue, New York, N.Y. 10018 and 3450 Cahuenga Blvd, West, Los Angeles, California 90068 (see “21st Century 3D is a full-service stereoscopic 3D motion picture production company with offices in New York City and Los Angeles.”)).

12. See Twitter profile for “@21C3D”, “Stereoscopic & VR pioneer, developer of 3D content & technology. Our 1st 3D film was shot in 1991 on 16mm. 1st VR experience with the Duke Nukem engine in 1997!”. Many of these Twitter tweets for “@21C3D” discuss the use of unmanned aerial vehicles (U.A.V.) as a platform for Hollywood full feature movie cameras. On a YouTube channel entitled “21C3D” a video appears with the following description, “The International 3D Society hosted a panel on stereoscopic content creation during the 66th annual Cannes Film Festival at the American Pavilion on May 16, 2013. 21st Century 3D Founder and CEO Jason Goodman was one of the panel speakers.” [emphasis added] (https://www.youtube.com/watch?list=UUR7qjFWlxC1nQILoFX9UeJw&v=789p9gPO3MA&feature=emb_title).

13. On a website sponsored by the International Society for Optics and Photonics a listing is provided that states, “Jason Goodman, Founder & CEO at 21st Century 3D” 3 (<https://spie.org/profile/Jason.Goodman-36670?SSO=1>). As stated in a Boston Globe article, dated May 3, 2012, entitled “Curry College prepares students for 3D film-making”, the following language appears as a caption to a photograph “Curry College students learn 3D film

techniques from Jason Goodman (kneeling, second from right), CEO of 21st Century 3D, based in Los Angeles. NATALIE FEULNER FOR THE BOSTON GLOBE” [emphasis added] .

14. A LINKEDIN.com listing for 21st Century 3D provides this description, “21st Century 3D is a fullservice stereoscopic 3D motion picture production company with offices in New York City and Los Angeles. We provide cutting edge live-action and computer generated stereoscopic 3D.” [emphasis added] (<https://www.linkedin.com/company/21st-century-3d/>)

15. According to a corporate filing with the U.S. Securities and Exchange Commission (SEC) in 2014 by “Recall Productions”, “Mr. Goodman .. as the Chief Executive Officer of a leading production company, 21st Century 3D.” According to the blog “RED USER” (referring to the RED camera) in a 5/01/2009 article describing offices in Los Angeles, “Jason Goodman (21st Century 3d) also calls our offices home.” (<http://www.reduser.net/forum/showthread.php?29032-Hello-all!-Newmember-intro-Red-3D-amp-more>).

16. The undersigned asserts that there are no entries in the state records of the Secretary of State of either New York or California for this dubious enterprise (21C3D). Interestingly, the C.E.O. represents that he is the “C.E.O.” of this mysterious entity indicating some form of corporate structure. This underground business operation (21C3D) fits the profile of an unaccountable off-book business that may have attempted to evade franchise taxes, employment taxes, workers compensation fees, etc. This constitutes unethical and unauthorized business activity in California with the intent to defraud the State of California.

17. PATREON.COM, San Francisco, CA, has been making payments to the benefit of Jason Goodman, or 21st Century 3D, or M.S.D.I., or whatever. Goodman has presented no quantifiable damages of losses from the prime source of his funding – PATREON.COM.

18. A subpoena to PATREON.COM will finally answer the question about what entity is exactly receiving funds (believed to be non-taxed) from PATREON.COM.

Certified under penalties of perjury.

March 31, 2023 (3/31/23)

A handwritten signature in black ink, appearing to read "D. G. Sweigert".

**D. G. SWEIGERT PRO SE DEFENDANT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

CERTIFICATE OF SERVICE

It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

truth@crowdsourcethetruth.org

And

Georg.webb@gmail.com

berlins@ballardspahr.com

mishkinm@ballardspahr.com

margaret.esquenet@finnegan.com

liz.lockwood@alilockwood.com

Certified under penalties of perjury.

March 31, 2023 (3/31/23)



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